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10	Counsel for Plaintiff		
11	UNITED STATES	DISTRICT COURT	
12	NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION		
13		MDL No. 3084 CRB	
14	IN RE: UBER TECHNOLOGIES, INC., PASSENGER SEXUAL ASSAULT	NOTICE OF MOTION AND MOTION TO	
15	LITIGATION	WITHDRAW AS COUNSEL FOR	
16		PLAINTIFF K.B.	
17	This Document Relates to:	Honorable Charles R. Breyer	
18	K.B. v. Uber Technologies, Inc., et al; 3:25-cv-02650-CRB		
19			
20	NOTICE OF MOTION AND MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF K.B.		
21	TO ALL PARTIES AND THEIR COUNSEL OF RECORD, PLEASE TAKE NOTICE		
22	that as soon hereafter as the matter may be heard, Peiffer Wolf Carr Kane Conway and Wise,		
23	LLP ("Peiffer Wolf"), counsel of record for Plaintiff K.B. ("Plaintiff"), moves this Court for an		
24	order permitting its withdrawal as counsel for Plaintiff.		
25	This Motion is made pursuant to Local Rule 11-5(a) and C. This Notice of Motion &		
26	Motion is based on the below Memorandum in Support and the accompanying Declaration of		
27	Rachel B. Abrams ("Decl."), attached hereto as Exhibit A. A Proposed Order is attached as		
28	Exhibit B.		

MEMORANDUM IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL

Pursuant to Local Civil Rule 11-5(a) and California Rules of Professional Conduct 1.16(b)(4) and 1.16(d), Peiffer Wolf submits this Memorandum of Law in support of its Motion to Withdraw as Counsel for Plaintiff K.B. Peiffer Wolf respectfully requests the Court grant the Motion.

STATEMENT OF FACTS

Peiffer Wolf should be permitted to withdraw as counsel for Plaintiff. An attorney may withdraw from a case by obtaining an order from the court after reasonable advance written notice has been provided to the client and to all other parties. Civ. L.R. 11-5(a); see also Cal. Rules Prof. Conduct 1.16(d)(1).

Peiffer Wolf has given appropriate advance notice of its intent to withdraw to Plaintiff beginning on September 25, 2025, and culminating with final notice on September 30, 2025. Decl. ¶¶ 5(j). Peiffer Wolf has also given Uber advance notice. Decl. ¶ 7. Peiffer Wolf has taken all possible steps to avoid prejudice to Plaintiff by explaining to her the possible consequences of failing to contact Peiffer Wolf or meet discovery deadlines. Decl. ¶¶ 5-6. Peiffer Wolf also submitted the limited information Peiffer Wolf did have. Decl. ¶ 5. Despite those efforts, Plaintiff failed to establish useful communication with Peiffer Wolf ¶ 5. Plaintiff also failed to provide Peiffer Wolf with sufficient or adequate information to confirm her claim ¶ 6. Peiffer Wolf has thus taken all reasonable steps to avoid foreseeable prejudice to Plaintiff. Decl. ¶ 9.

Under California Rule of Professional Conduct 1.16(b)(4), a lawyer may withdraw from a case if "the client ... renders it unreasonably difficult for the lawyer to carry out the representation effectively." Here, Plaintiff rendered it unreasonably difficult for Peiffer Wolf to carry out the representation effectively by failing to communicate with Peiffer Wolf and failing to provide information required to prosecute her case, despite requests from Peiffer Wolf. Decl. ¶ 5. Therefore, Peiffer Wolf has been unable to meet discovery deadlines in this case.

Because this motion is not accompanied by a substitution of counsel or an agreement by Plaintiff to proceed *pro se*, Peiffer Wolf agrees to the condition imposed by Local Rule 11-5(b)

to serve Plaintiff with all papers in this matter, unless or until Plaintiff appears pro se, other

CONCLUSION	1	counsel appears on Plaintiff's behalf, or upon further order of the Court. Decl. ¶ 10.			
parentation of Plaintiff and allowing Plaintiff 30 days to retain new counsel. DATED: October 9, 2025 RESPECTFULLY SUBMITTED, BY: /S/ RACHEL B. ABRAMS RACHEL B. ABRAMS RACHEL B. ABRAMS (CAL BAR NO. 209316) ADAM B. WOLF (CAL BAR NO. 215914) PEIFFER WOLF CARR KANE CONWAY & WISE, LLP S55 MONTGOMERY STREET, SUITE 820 SAN FRANCISCO, CA 94111 TELEPHONE: 415, 766, 3544 FACSIMILE: 415,840,9435 EMAIL: RABRAMS@PEIFFERWOLF.COM AWOLF@PEIFFER WOLF CARR KANE CONWAY & WISE, LLP 15 DETROIT, MI 48216 TELEPHONE: 313, 210, 1559 FACSIMILE: 415,840,9435 EMAIL: TELLIS@PEIFFERWOLF.COM COUNSEL FOR PLAINTIFF COUNSEL FOR PLAINTIFF COUNSEL FOR PLAINTIFF	2	2 <u>CONCLU</u>	CONCLUSION		
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BY: S/RACHEL B. ABRAMS RACHEL B. ABRAMS (CAL BAR NO. 209316) ADAM B. WOLF (CAL BAR NO. 215914) PEIFFER WOLF CARR KANE CONWAY & WISE, LLP 555 MONTGOMERY STREET, SUITE 820 SAN FRANCISCO, CA 94111 TELEPHONE: 415.766.3544 FACSIMILE: 415.840.9435 EMAIL: RABRAMS@PEIFFERWOLF.COM AWOLF@PEIFFER WOLF CARR KANE CONWAY & WISE, LLP 13 TIFFANY R. ELLIS (ADMITTED PHV) PEIFFER WOLF CARR KANE CONWAY & WISE, LLP 2229 TRUMBULL ST. DETROIT, MI 48216 TELEPHONE: 313.210.1559 FACSIMILE: 415.840.9435 EMAIL: TELLIS@PEIFFERWOLF.COM COUNSEL FOR PLAINTIFF 16 COUNSEL FOR PLAINTIFF 22 23 24 25 26 27	4	4 representation of Plaintiff and allowing Plaintiff 30	representation of Plaintiff and allowing Plaintiff 30 days to retain new counsel.		
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